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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

StudioCanal Image S.A., f/k/a)
Canal + D.A.,)
Opposer,)
v.)
Sonic Trading Management LLC,)
Applicant.)

Opposition No. 125,000

Serial Nos. 76/007,851
76/007,852
76/007,850
76/006,701

TRADEMARK TRIAL AND
APPEAL BOARD
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CERTIFICATE OF MAILING

I HEREBY CERTIFY THAT THIS CORRESPONDENCE IS BEING
DEPOSITED WITH THE UNITED STATES POSTAL SERVICE AS
FIRST CLASS MAIL IN AN ENVELOPE ADDRESSED TO
ASSISTANT COMMISSIONER FOR TRADEMARKS, ATTN TTAB:,
2900 CRYSTAL DRIVE, ARLINGTON, VA 22202-3513, ON
THIS 28 DAY OF February 20 02

SHERIDAN ROSS P.C.

BY:

Loe R. Arrellan

ANSWER TO NOTICE OF OPPOSITION

Applicant Sonic Trading Management, LLC ("Sonic") hereby Answers Opposer StudioCanal Image S.A., f/k/a Canal + D.A. ("StudioCanal") Consolidated Notice of Opposition as follows:

1. Sonic admits the allegations set forth in paragraph 1 of the Consolidated Notice of Opposition.
- 2.-6. Sonic has insufficient information to form a belief as to the truth or accuracy of the allegations set forth in paragraphs 2, 3, 4, 5 and 6 of the Consolidated Notice of Opposition and therefore denies those allegations.

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7. With regard to paragraph 7 of the Consolidated Notice of Opposition, Sonic has insufficient information to form a belief as to the truth or accuracy of the allegations set forth in the first sentence of the paragraph. Sonic denies the allegations set forth in the second and third sentences of paragraph 7 of the Consolidated Notice of Opposition. Moreover, Sonic notes that there are a number of third parties that own either allowed federal trademark applications or registrations for marks containing the word TERMINATOR or T2 which lessens the distinctive nature of Opposer's alleged marks and narrows the scope of protection to which any such marks may be entitled. These third party marks specifically include at least:

MARK	GOODS	STATUS	OWNER
TERMINATOR	Insurance underwriting in the field of life insurance	Notice of Allowance issued 8/14/01	Reliastar Life Insurance Co. Minneapolis, MN
TERMINATOR	Diamond-containing power saw blades, bits for power drills and power grinding wheels all for use in the marble, granite, concrete, asphalt, roofing and tile industry	Registered 10/16/01	Continental DIA Diamond Products, Inc. San Leandro, CA
TERMINATOR	Firefighting equipment, namely monitors	Registered 6/6/00	National Foam, Inc. Exton, PA
TERMINATOR	Apparatus for deflating tires of vehicles, namely, hollow metal spikes in a frame to be placed in the path of a stationary or moving vehicle	Notice of Allowance issued 12/25/01	Stop Stick Ltd. Lawrenceburg, IN
TERMINATOR	Trencher chains, links teeth, teeth and bits	Registered 12/16/97	Ballantine, Inc. Minneapolis, MN

MARK	GOODS	STATUS	OWNER
TERMINATOR	Coating for coating battery terminals and other electrical connectors to prevent corrosion	Notice of Allowance issued 11/27/01	North American Oil Co. Atlanta, GA
TERMINATOR	Removal of adhered layers from horizontal surfaces in the nature of carpet, asphalt, wood flooring, tiles and concrete	Registered 1/30/01	Innovatech Products and Equipment Co. Bothell, WA
TERMINATOR	Power driven hand-held rotohammer for use in the pest control industry	Registered 10/15/96	SB Power Tools Co. Chicago, IL
TERMINATOR	Electrical wiring terminal modules, namely, connection and disconnection modules for connecting electrical wiring on contact elements; parts for the foregoing goods; accessories for electrical wiring terminal modules, namely bridge elements, test plugs, plug-in fuse holders, labeling elements, plugs and insertion tools	Registered 1/26/99	Krone Aktiengesellschaft GmbH
TERMINATOR (stylized)	Plumbing fittings, namely valves having a read-out port	Registered 6/4/96	Jomar International Ltd.
TERMINATOR	Heavy duty deodorant designed primarily for heavy odor especially in fire damage	Registered 6/20/95	Promaster Inc. Dothan, AL
TERMINATOR	Hose made primarily of rubbery material for multi-purpose industrial use	Registered 10/10/95	Gates Corporation Denver, CO
TERMINATOR	Remote controlled mobile underwater device for detecting and destroying naval military mines by detonating an explosive charge	Registered 5/16/95	Cayman Aerospace Corp. Bloomfield, CT
TERMINATOR	Floor finish stripping preparation	Registered 12/6/94	WW Granger, Inc. Lake Forest, IL

MARK	GOODS	STATUS	OWNER
TERMINATOR	Odor resistant insoles for shoes	Registered 2/16/93	Cadillac Shoe Products, Inc. Southfield, MI
TERMINATOR	Water sterilizers using ultraviolet rays for sterilizing swimming pools and aquarium water	Registered 1/17/95	Terminator Water Products, Inc. Vancouver, Canada
TERMINATOR	Domestic or agricultural pesticides, namely, parafinized pellets for indoor and outdoor rodent control	Registered 4/19/94	Alpharama, Inc. Fort Lee, NJ
TERMINATOR	Paint sealers for automobile use	Registered 7/13/93	High Temp Products Co. Omaha, NE
TERMINATOR	Storage batteries	Registered 4/13/93	Continental Battery Manufacturing Corp. Dallas, TX
TERMINATOR	Tear gas weapons for personal defense	Registered 5/14/96	United Defense Equipment Corp. Phoenix, AZ
TERMINATOR	Loud speaker systems	Registered 2/19/91	Mytech Corp. Phoenix, AZ
TERMINATOR	Quarry and mining equipment, namely rock crushing machines and impact hammers and parts therefor	Registered 10/17/89	Rocktek Ltd. New Zealand
TERMINATOR	Internal house organ	Registered 1/17/67	Whitaker Corp. Wilmington, DE
T2	Computer software for characterizing telephone system operating parameters	Registered 6/3/97	Tropper Technologies, Inc. Arlington Heights, IL
T2	Computer software for coordinating the dispatching, monitoring the movement of and billing for services provided by transportation vehicles	Application allowed, waiting for use to be proved	Track Software Inc. Covington, KY
T2B	Business consultation services in the field of finding, exploiting and managing hydrocarbon reservoirs	Registered 10/23/01	Landmark Graphics Corp. Houston, TX

MARK	GOODS	STATUS	OWNER
T2 TECHNOLOGIES	Telephone communication services, namely, local access and long distance telephone services; cellular telephone services; paging services; electronic transmission of messages and data and technical consultation in the field of telecommunications	Registered 10/17/00	T2 Technologies, Inc. Englewood, CO
T2 SYSTEMS INC.	Computer software for parking management applications, namely, tracking customer information, applying late fees, issuing and tracking parking permits and citations and user manuals distributed therewith	Registered 2/13/01	T2 Systems, Inc. Danville, IN
T2K MANAGER	Computer software for prioritizing and resolving computer software problems related to Year 2000 issues	Registered 9/26/00	Censoft Inc. Deerfield Beach, FL
T2B	Computer software, namely, software for communicating information and sharing data between software which processes technical information and data in the oil and gas industry and software which processes business information and data in the oil and gas industry	Notice of Allowance issued 5/29/01	Landmark Graphics Corp. Houston, TX
T2 HIGH TEMPERATURE AND TENSILE STRENGTH LEADS	Electrical components, namely, printed circuit devices having thick film copper connectors and for use as attenuators, resistors and line terminators	Registered 9/8/98	Bird Electronic Corp. Solon, OH
T2-BGA	Integrated circuits, electronic component cooling devices, namely, heat syncs for integrated circuits	Registered 2/1/00	Caesar Technology Inc. China

MARK	GOODS	STATUS	OWNER
T2R	Electro-mechanical relays	Registered 2/9/93	Teledyne Technologies, Inc. Los Angeles, CA
TELLVIEW T2	Information retrieval computer programs in the field of telephone tariffs and pricing	Registered 12/10/96	United Communications Group Ltd. Partnership Rockville, MD
T2 TRAVEL	Audio cassette tapes featuring instruction in foreign languages for travelers	Registered 5/11/93	Steven Carmichael Rochester, MN
T2 RESTAURANTS	Restaurant services	Registered 12/15/98	Theresas Two Inc. Princeton, NJ

8. Sonic has insufficient information to form a belief as to the truth or accuracy of the allegations set forth in paragraph 8 of the Consolidated Notice of Opposition and therefore denies the allegation.

9. As set forth in paragraph 9 of the Consolidated Notice of Opposition, Sonic admits that it is using the word TERMINATOR and T2 on its website. All other allegations set forth in paragraph 9 of the Consolidated Notice of Opposition not specifically admitted are denied.

10-13. Sonic denies the allegations set forth in paragraphs 10-13 of the Consolidated Notice of Opposition.

WHEREFORE, Sonic prays that Application Serial Nos. 76/007,851; 76/007,852; 76/007,850; and 76/006,701 be allowed to issue as registrations, and that the present opposition proceeding be denied without prejudice.

DATED: February 28, 2002.

Respectfully submitted,

By 

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ATTORNEYS FOR APPLICANT
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CERTIFICATE OF MAILING

I hereby certify that on this 28th day of February, 2002, a true and correct copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** was deposited in the United States Mail, first class postage prepaid, addressed to the following:

Cathy J. Furrowsky, Esq.
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Loe R. Arellano

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